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 (SUED HEREIN AS "R. LIDDLE")

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 MELISSA DEATHRIDGE

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 (San Jose)

MELISSA DEATHRIDGE)	No. C08-00660 HRL
Plaintiff,)	
v.)	JOINT INITIAL CASE MANAGEMENT
)	CONFERENCE STATEMENT
COUNTY OF SANTA CLARA, et al.)	Date: May 20, 2008
Defendants.)	Time: 1:30 p.m.
)	Crtrm.: 2, 5 th Floor
)	Judge: Magistrate Judge Howard R. Lloyd

Pursuant to Civil Local Rule 16-9, Plaintiff Melissa Deathridge and Defendants County of Santa Clara, Carl Sims, and Robert Liddle submit this Joint Case Management Conference Statement and request the Court to adopt the statement as its Case Management Order in this case.

1. Jurisdiction and Service:

This Court has jurisdiction over this 42 U.S.C. § 1983 action pursuant to 28 U.S.C. § 1331. All parties have been served.

1 2. Facts:

2 On November 29, 2007, Defendants Deputies Carl Sims and Robert Liddle, who were in
 3 plain clothes, allegedly, and working “after hours” attempted to serve a \$5,000.00 arrest warrant
 4 on Plaintiff, Melissa Deathridge at 3575 Almaden Road, San Jose, California. When Melissa
 5 Deathridge asked for their identification to ascertain whether or not they were officers, they
 6 allegedly advised her that they were not required to produce the same. She thereafter, allegedly,
 7 turned her back on them after they had refused to provide her with proper identification and ran
 8 back to the house door. The officers allegedly hopped over the fence and pursued her to the
 9 front door. As she turned the handle to open the door, she was allegedly knocked off her feet
 10 and pushed into the door. Both Defendant officers allegedly knocked the door off its hinges,
 11 and landed on top of Plaintiff (along with the door). Plaintiff’s hand was allegedly bleeding
 12 after the door fell on her. The officers transported Plaintiff to Santa Clara County’s Valley
 13 Medical Center. An X-ray of Plaintiff’s hand revealed no broken bones. A bandage was place
 14 over the alleged large cut in her hand. Plaintiff was then taken to the jail, where she was booked
 15 on the warrant and one charge of resisting arrest (Cal. Penal Code Sec. 148). Both charges were
 16 later resolved by voluntary dismissal by the District Attorney for Santa Clara County.

17 3. Legal Issues:

18 The disputed legal issues include, but may not be limited to: 1) whether Defendants may
 19 be held liable under Plaintiff’s first cause of action for assault; 2) whether Defendants may be
 20 held liable under Plaintiff’s second cause of action for battery; and 3) whether Defendants may
 21 be held liable under Plaintiff’s third cause of action under 42 U.S.C. section 1983, for violations
 22 of the Fourth, Sixth, and Fourteenth Amendments to the Constitution of the United States.

23 4. Motions:

24 There are no pending motions, however, Defendants may file a dispositive motion.

25 5. Amendment of Pleadings:

26 The parties do not anticipate any amendments to the pleadings.

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1 6. Evidence Preservation:

2 Defendants have preserved evidence, including police reports and documents pertaining to
3 Plaintiff's criminal proceedings. Plaintiff has preserved evidence, including medical records
4 and records of criminal proceedings as well.

5 7. Disclosures:

6 The parties will serve their initial disclosures by June 16, 2008.

7 8. Discovery:

8 Discovery has not yet begun. The parties do not anticipate any modifications to the
9 discovery rules.

10 9. Class Actions:

11 This action is not a class action.

12 10. Related Cases:

13 There are no related cases.

14 11. Relief:

15 Plaintiff seeks general damages, medical and related expenses, attorney's fees, lost
16 earnings, and costs of suit.

17 12. Settlement and ADR:

18 Counsel have met and conferred regarding ADR and have agreed to participate in
19 mediation.

20 13. Consent to Magistrate Judge for All Purposes:

21 The parties have consented to proceeding before a Magistrate Judge.

22 14. Other References:

23 This case is not suitable for reference to binding arbitration, a special master, or the
24 Judicial Panel on Multidistrict Litigation.

25 15. Narrowing of Issues:

26 This case does not require liability to be bifurcated from damages at trial.

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16. Expedited Schedule:

Due to the disputed factual and legal issues this is not a case that is suitable for handling on an expedited basis.

17. Scheduling:

The parties propose the following:

Expert disclosure	March 10, 2009
Discovery cutoff	April 14, 2009
Dispositive motions	April 28, 2009
Pretrial conference	June 4, 2009
Trial	June 15, 2009

18. Trial:

The parties have requested a jury trial.

19. Disclosure of Non-Party Interested Entities or Persons:

Defendants are the County of Santa Clara and employees thereof. Therefore, they are not required to file a Certification of Interested Entities or Persons.

I hereby attest that I have on file the holograph signature for the signature indicated by a "conformed" signature (/S/) within this e-filed document.

Dated: May 9, 2008

Respectfully submitted,

ANN MILLER RAVEL
County Counsel

By: /S/
KEVIN M. HAMMON
Deputy County Counsel

Attorneys for Defendants
COUNTY OF SANTA CLARA,
CARL SIMS, ROBERT LIDDLE
(sued herein as "R. LIDDLE")

Dated: May 9, 2008

By: /S/
MARIANNE C. ROSSI, ESQ.

Attorneys for Plaintiff
MELISSA DEATHRIDGE